

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SARAH CHANG,

Plaintiff,

v.

MICHAEL CHANG,

Defendant.

Case No. 25-CV-4917 (PAE)

Hon. Paul A. Engelmayer

AFFIDAVIT OF MICHAEL CHANG

I, the undersigned, hereby affirm the following:

1. My name is Michael Chang. I currently live in New York. I am thirty-seven years old.
2. Plaintiff Sarah Chang is my sister. We were once very close.
3. Sarah was a child prodigy. At the age of five, she auditioned for and was accepted to Juilliard. She spent the next three decades touring with orchestras across the world. I know personally that she has earned millions of dollars performing violin. I also know that more recently, her work has not been as regular.
4. In 2022, Sarah approached me and asked me if I would be willing to gift her a certain amount a month, each month, for the foreseeable future. At the time, I agreed. I did not have a problem giving her some of my paycheck each month.
5. After an extended back and forth with Sarah's lawyer and accountant, they landed on a specific solution—to ask me to sign a promissory note to make “payments” on a “loan” that Sarah had made to me, rather than as a “gift” I would make to her. I am not certain why.

6. I signed the note, and for the first two years, I paid her \$6,667 every month willingly, as a gift. I did not make these payments simply because I thought I was legally obligated to, for any reason.
7. Last year, after Sarah threatened litigation over a different dispute, I decided to stop gifting her this amount.
8. This lawsuit ensued. I hired counsel only because I was forced to do so by my sister's antics.
9. I state, without equivocation, that I will not willingly pay Sarah *any* future payments of \$6,667, on this phony promissory note, or on anything else.

I declare under penalty of perjury that the foregoing is true and correct.

Signed on 30 day of July, 2025.



Michael Chang